

MENTAL

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

JUL 10 1994

Mr. Richard Dworek, General Manager
Environmental Affairs-Air
U.S. Steel Group
USX Corporation
600 Grant Street
Pittsburgh, Pennsylvania 15219-2749

Re: Pittsburgh Meeting on July 21, 1994

Dear Mr. Dworek:

I appreciated the opportunity to speak with you during my visit to Pittsburgh on July 21, 1994. Upon my return to the Philadelphia Office, I spoke to personnel in both the Air, Radiation and Toxics Division and our Office of Regional Counsel involved with the Continuous Emission Monitoring (CEM) issue which you had raised in regard to your Clairton and Edgar Thomson facilities. In so doing, I learned that the Pennsylvania Department of Environmental Resources (DER) requirement for in-stack NOx monitoring equipment, for certain size combustion units, was established due to the immediate need of the Commonwealth for an accurate NOx emission database which would be used for the development of a State-wide strategy to combat acid deposition as well as the ozone nonattainment problem. As you know, NOx is a precursor to the generation of groundlevel ozone as well as acid deposition.

I have also been made aware that enforcement negotiations are ongoing at the present time on an appropriate response to the violations at these USX facilities of the federally-approved Pennsylvania Implementation Plan. I am confident that your concerns will be taken into consideration during the settlement process. I understand that, although significant capital expenditures were made by USX on the parametric monitoring system in use at these two facilities, your Company never received approval from the Pennsylvania DER for use of this system in meeting the State regulations and that this NOx monitoring regulation was crafted in a very prescriptive manner prohibiting the type of system currently in use by USX.

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CONCURRENCES							
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SURNAME	▶ HAGEDORN	ABRAMS	TURLINSKI	MASLANI	KOSTMAYER		
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I hope that this information adequately explains EPA's position and the need for a speedy resolution to this matter. It was a pleasure meeting you and I look forward to a productive working relationship with your Company in furthering environmental protection in Pennsylvania and elsewhere in Region III.

Sincerely,

Peter H. Kostmayer
Regional Administrator